

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

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UNITED STATES OF AMERICA )  
                                )  
Plaintiff,                 )  
                                )  
V                             ) CASE NO. 00-6311-CR-HUCK  
                                )  
Ricardo McHORNE, et al., )  
                                )  
Defendant.                 )  
\*\*\*\*\*

**DEFENDANT'S MOTION FOR DISCOVERY  
UNDER FED. R. CRIM. P., RULE 16**

COMES NOW the Defendant, Ricardo McHORNE, by and through undersigned counsel, and moves this Honorable Court for a formal Order for Discovery by the Defense under and fully in accord with Federal Rule of Criminal Procedure 16.

Defense requests full discovery and inspection of all materials in possession, custody or control of the Government, including but not exclusive to: any statement of the Defendant; Defendant's prior record; any documents or tangible objects; any reports of examinations and tests; list of any expert witnesses to be used under Rules 702, 703, or 705 of the Federal Rules of Evidence.

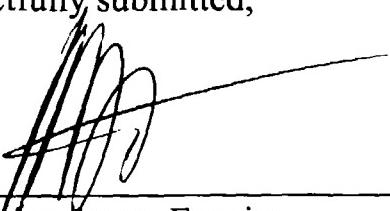
Additionally, any of the above materials that are discovered during the

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process of this case and or trial, they too shall be released to the defense without  
delay.

The undersigned counsel certifies that he has conferred with Assistant U.S.  
Attorney MICHAEL DITTO, opposing counsel, in a good faith effort to resolve  
by agreement the subject matter of this Motion.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Motion was mailed this February 12, 2001 to the following:

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